

State of Tennessee Department of Children's Services

Manual for Developing Policies and Procedures

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CHAPTER 1

Policy Content

Policy Content

Section headings

The thirteen (13) section headings described in this chapter represent the content and organization to be used in constructing all DCS policies.

The policy section headings are as follows:

- 1. Subject
- 2. Supersedes
- Local Policy, Local Procedures, Training Required
- 4. Approved by
- 5. Effective date, Revision date
- 6. Application
- 7. Authority
- 8. Policy statement
- 9. Procedures
- 10. Forms/Templates
- 11. Collateral documents
- 12. Standards
- 13. Glossary

Section Content

The following is a description of the contents of the thirteen sections (13) within the development of a DCS policy:

1. Subject: This is the designated policy title.

Note: Policies are identified by an index number at the top of the page and in the footer. Only the Departmental Policy Coordinator (DPC) can assign the policy index numbers.

- **2. Supersedes:** (Definition: *To take the place, room, or position of; Replace*) List superseded policies and their effective dates.
- 3. Local policy/Local Procedures: this section will either be denoted with a "yes" or "no" and is used when a "local" policy/or procedure is needed to further expand on what is not covered in a DCS departmental policy, usually in an institution, group home, or DCS regional office. A "local" policy is different from location to location depending on the type of facility or office and/or their operating procedures. See page 27, Local Policy Format.

Training required: This section will be denoted with a "yes" if training on the procedures of this policy is required of staff in order to perform their job duties or "no" if training is/not required of staff in order to perform their job duties.

- **4. Approved by:** The Commissioner will officially approve all departmental policies by original signature. After the Commissioner approves a policy, the DPC links the commissioner's electronic signature to policies that are on-line. The original signed policy is filed in the policy historical files. Until then, the policy is not official, and this space otherwise, remains blank.
- **5. Effective date:** This is the date on which the policy was <u>implemented</u> and the original effective date of the policy. This date will remain on the policy for the life of the policy.

Revision date: This is the date that the policy was revised and is the <u>most current</u> effective date of the policy.

6. Application: This section lists the general grouping of employees, persons or groups to whom the policy is directed and the group of employee or persons most specifically affected by the document. If children/youth or families are to be allowed access to policy, they must be listed here also.

Example:

Application

To All Department of Children's Services Child Protective Services Employees

7. Authority: This section includes the legal authority by which the policy is issued and is reviewed and approved by legal staff. Any questions or problems regarding the information listed in this section, the DCS legal division should be contacted.

Example: Authority: TCA 31-1-406; 37-5-106, 37-5-112, 37-1-606

8. Policy: The American Correctional Association defines policy as a "definite, stated course or method of action adopted and pursued by an agency which guides and determines present and future decisions and actions of that agency." The policy statement is the focal point of the policy. It should appear in the form of a complete sentence, ending with a period, and be brief, clear, and concise. Use the verb **shall**, to express the Department's intent. **Shall** denotes a mandatory requirement.

It is imperative that policy statements and procedural statements not be perceived as synonymous. Policy statements declare "what," "who," "why" the intent/goal of the Department; they never contain "how, who, when, or where" information. Procedural statements do not state the broad intent/goal of the Department; they do explain the "who, how, when, or where" through which the policy is carried out.

Example:

Policy

Child Protective Services staff shall initiate child protective services investigations within the time frame assigned by the supervisor or his/her designee.

9. Procedures: Procedural statements must describe who, how, when, and where the policy statement is to be implemented. Procedural statements are brief; together they describe the general sequence of events necessary to implement the policy. They should direct actions to be taken in a particular situation to perform a specific task within the guidelines of the policy. Policy statements are never placed in the explanations of procedures, and procedures exist only to give a method for carrying out the policy statement. Procedures are action oriented. Procedures also frequently point out the consequences of failure to comply, such as damage, loss, injury, or discipline. Clearly stated consequences help users understand (1) the seriousness of the matter and (2) their responsibility for it.

Helpful hints for writing policy procedures: (Adapted from Writing Effective Policies and Procedures by Nancy J. Campbell)

1. Use active voice, present tense

Place procedures in the sequence in which they should be accomplished by using active voice, present tense. The shortest, clearest, most powerful message you can send in the English language is in active voice, present tense. Compare the following:

 Case Managers must complete form CS-1234 within ten (10) days. ♦ Form CS-1234 must be completed by case managers within ten (10) days.

In the second sentence, passive voice lengthens and makes it harder to figure out who's responsible for the action. The "who" now comes at the end of the sentence instead of the beginning and when you switch to a verb tense other than present (the most common is future tense), you also add length.

The most significant problem with future tense is that it implies the action must be taken *sometime*, where present tense implies immediacy. Stay with active voice and present tense most of the time. Note: There are some exceptions. Certain procedures, such as software instructions, use passive voice to avoid endless repetition of "you" or "the operator."

When stating to who this policy applies or who is to implement a procedure, make sure that the personnel listed have the authority to implement all the procedures.

2. Clearly identify the level of priority Clearly identify the level of priority and responsibility ascribed to a procedure by making the following distinctions (see page 49):

- a) Procedures that are absolutely required—use the verb, <u>must</u>
- b) Procedures that describe best practice but are not absolutely required—use the verb, <u>should</u>
- c) Steps simply stating the sequence of events—use the simple present tense of the action verb (for example, "the court *reviews* all documentation").
- d) Steps that are at an employee's discretion (such as choices or options)—use the verb, <u>may</u>
- 3. Use standard word order

Standard word order is active voice: subject-verb-object. It's standard precisely because it's the shortest, clearest way to convey a direct message. In policies and procedures, its often best to make the subject an "implied" subject (leave it out and start with the verb.) Both of the following sentences use standard word order, but the second sentence shortens by using an implied subject and starting with an action verb.

- ♦ Employees submit their timesheets bi-weekly.
 - Submit timesheets bi-weekly.

The minute you deviate from standard word order, you begin to lengthen and generally add padding. Some variation in word order is desirable to prevent monotony. The problem is that we tend to get carried away with it and add too many fancy phrases and clauses, too much passive voice and future tense. The bulk of your writing should use standard word order.

4. Use parallelism

Parallelism is a form of consistency that creates a rhythm in the document. It simply means using the same grammar construct for like items. Consider this nonparallel example:

• Read the document, be sure to sign it, and then it must be returned to Personnel.

Nonparallel writing sounds awkward and stops the reader. It breaks the rhythm. Find the key concepts and put them into the same format. Use the same parts of speech (verb with verb, noun with noun). Use words or phrases of approximately the same length. The rhythm returns and the sentence is shorter:

♦ Read the document, sign it, and return it to Personnel.

Use parallelism in sentences, paragraphs, lists, and headings. It applies everywhere and is one of the most important elements in making a document easy to read.

5. Be Consistent

Pick a few good verbs and nouns, and then use them consistently. It may violate your vocabulary training, but it helps readers feel comfortable. They hate seeing a new word every time. It's just one more thing to cope with unnecessarily. Repetition of familiar, useful words increases both comprehension and speed.

6. Use short words and acronyms

If possible stick with words of one or two syllables. Short means fast and easy for the reader.

Acronyms (a word formed from the initial letter or letters of each of the successive parts or major parts of a compound term or name) may be used providing that the first occurrence of the word or name is spelled out followed by the acronym, after which the acronym may be used throughout the remainder of the policy.

Example: Department of Children's Services (DCS)

7. Use common words

Don't get fancy. We really don't <u>utilize</u> the hammer, we <u>use</u> it. Common words are common for a reason: They

words

work. Everyone understands them. They're fast and easy and they are usually short.

8. Use short sentences

The absolute maximum is twenty words, but even that's pretty long for this type of writing. If possible, aim for a maximum of fifteen words per sentence; then, even if you occasionally run over, you're still OK. Short sentences help make sure that you're using standard word order and that you're not using too many extra clauses.

Use short paragraphs Use a maximum of one hundred words. Long paragraphs create a heavy, gray look that turns the reader off. If it looks long and complicated, readers assume it is.

In procedures, average paragraph length should be much shorter- forty words or fewer.

10. Use lots of lists

Lists are a policy and procedure writer's bread and butter, a staple. They shorten, they force you into good habits such as active voice, and they encourage parallelism. They're also easy on the reader's eye because they indicate a flow and create lots of blank space on the page. Readers love lists. Writers should love lists. The whole world loves a good list.

11. Write as you speak

This is probably the best way to avoid pompous language and windy phrases. But old habits keep telling you that it's not good enough to go on paper. In most cases, it's exactly what you do want on paper: simple, clear, to the point, and understood by everyone. Pretend a user has stopped by to ask you how to do something, then answer (yes, it's OK to talk to yourself). Write it down just as you would say it. Then edit out the words or phrases that seem too informal or trendy.

It's a lot easier to edit up from the spoken work than to edit down from the pompous language.

12. Get rid of wordy phrases

We use them out of habit:

- ♦ In an effort to...
- In the event that...
- In the eventuality of...

A lot of this comes from the increasing use of legalisms in our society. A lot of it also comes from that old habit of trying to please the teacher with more words. Ditch these phrases!

13. Get rid of

Quit trying to impress. It does exactly the opposite. It

pompous language

sounds stuffy and overbearing and turns people off. No one really talks about "commercially hired rental vehicles." We talk about "rental cars." Come down to earth.

14. Get rid of flabby language

Flabby language is just too much of a good thing. Where one adjective would do, we use three: "Use the proper, designated, authorized form." It's as if someone found the word through and couldn't stop gorging. There are so many adjectives that the main idea gets lost. Remember to think in ones: One is better than two, and two is better than three. Avoid excess.

15. Watch the adjectives

This is where a lot of the flab sneaks up on you. Adjectives are fun. They let you get creative and expressive. Unfortunately, that's not what your readers are interested in. Speed and clarity, not creativity and flowery description, are the goal. Keep an eagle eye on the number of adjectives.

16. Get specific

One way to avoid flabby language is to be specific. Replace general descriptors with specific references:

♦ "Use Form CS-0001"

Not

◆ "Use the appropriate request form"

(Identify by number and title all DCS forms used in a procedure.)

Reference to times(s) and locations(s) must be specific:

"Within one hour"

Not

"As soon as possible"

Identify specific modes of communication:

♦ (letter, telephone, FAX, e-mail, etc.)

17. Get rid of empty phrases

Empty phrases are usually found at the beginning of sentences or clauses:

- ♦ There are...
- ♦ It is...

It's OK to use them occasionally, but they often serve no purpose.

18. Watch out for weasel words

Weasel words are words that sound as if you're trying to wiggle out of a commitment:

♦ Part A ought to fit into Part B.

Not likely to inspire much confidence in the reader, is it? Weasel words tend to destroy credibility. Most common are words like:

Could	Probably
May	Should
Might	Try
Most of the time	Usually
Ought to	Would

19. Use weasel words for flexibility where appropriate

Weasel words aren't always bad. They can make your statement elastic. Many policy statements in particular need to retain flexibility. Such statements are intended to cover normal operating conditions, not every conceivable circumstance that may arise. Rather than try to spell out everything, which is impossible, summarize those other circumstances.

20. Avoid turnoffs

Some words and phrases just make people mad. They include:

Absolutely	Of course
Always	Persist
Delinquent	Terminate
Fail	Tolerate
Never	Unfortunately

Obviously

Any word or phrase that's rigid or sounds like a parent disciplining a child will turn readers off.

21. Avoid redundancies

We're in the habit of using so many words that we don't realize we're repeating ourselves unnecessarily. "Advance planning," for instance. How can you plan for the past? "Almost perfect." Really? "Reread again." Hmmm...Remember your new status as a word miser and get rid of these nonsensical phrases.

22. Conquer problem words

Everybody has some word pair that's always been a puzzler. Is it affect or effect? Lie or lay? Ensure, insure,

problem words

or assure? See the list of problem words on page 50.

23. Watch out for jargon

Jargon is simply language that's specialized for an organization or field. It saves time and space for people who are in the know. The danger is that some readers may be left out. So simplify. If there's any way to write it in plain language, do. Remember that even if jargon doesn't confuse, it usually lengthens.

Note: This depends, too, on your audience. If the policy or procedure is for chemists in a laboratory, they're expecting the jargon. They want and need it, so use it.

24. Use transitional words and phrases at the start of sentences and paragraphs

These words give readers an instant clue about what's coming. They serve two functions: speed and preparation. When readers see the word "and," they know the paragraph is a continuation. If they see "but," they know an exception is coming. If they see "finally," they know the discussion is winding up. In a split second, you've given them the chance to prepare themselves mentally for the content ahead.

Ignore the old rule that said you should never start with a transitional word like "and." Remember, that's the rule for narrative writing. Ditch it in favor of speed and clarity. See the list of transitional words and phrases in the appendices of this manual.

25. Use onesentence paragraphs We all know the old rule said never to do this. Forget that rule. One-sentence paragraphs draw instant attention and help you isolate the most important statements in the policy and procedure:

♦ Any violation of safety rules is grounds for immediate dismissal.

It's hard to miss the message.

26. Limit the number of clauses and phrases

Clauses and phrases are dangerous. Used in moderation, they provide needed variety. But they're a little like rabbits: Turn your back and they seem to multiply in seconds. One phrase turns into three or four. Too many clauses and phrases are a dead giveaway that your sentences are too long and complicated. One, maybe two is OK. Anything more than that is highly suspect.

27. Keep clauses and phrases short

You may occasionally need a lengthier clause of ten words or so. But the general rule is five words or fewer.

28. Start with a verb

Readers want to know what they're supposed to do or know, so tell them with the very first word. This also helps eliminate long sentences, excess clauses, passive voice, inverted word order, and wordy phrases:

A written request for a leave of absence, stating the specific reason, the duration of the leave, and the expected beginning and ending dates of the leave, should be submitted to your supervisor for approval.

Whew! Readers who make their way through that deserve a medal. *Look for the verb*. Here it's "submit." Restructure the procedure around that and look what happens:

Submit a written request for leave to your supervisor. Include the following information:

- ♦ The reason for the leave.
- ♦ The length of the leave
- ◆ The beginning and ending dates of the leave.

29. Avoid negative wording

Grammatical negatives make the message harder to understand;

◆ Users should not be concerned if they are unable to meet these requirements without assistance.

Is there an interpreter in the house? Grammatical negatives are opposites. They twirl readers around and point them in the other direction. Do it too often and users get dizzy. Focus on what you want them not to do.

Note: Negatives are perfectly legitimate words when used sparingly and properly. They convey important information clearly:

- ◆ Do not add oil.
- ♦ Do not wait to submit your claim.

The goal is to avoid misuse and over use.

30. Avoid misplacement

Misplaced words, phrases, or sentences change the meaning. They can be merely frustrating, but they can also be harmful. What does "it" refer to here?

 When adjusting the valve in the engine, be sure it is shut off. 31. Use genderneutral language The great sexism debate still rages. Some readers are highly offended by the use of "he" and "she." Others think it's all a tempest in a teapot. Still, it's a sensitive issue that reduces the document's credibility and increases reader resistance. It can also become one more point in a legal debate. Err on the conservative side.

Examples:

♦ The manager submits his request,

But

- ♦ Managers submit their requests,
- ♦ When the employee requests her leave...

But

- ♦ When the employee requests leave...
- The case manager may submit a claim at any time.
 He may also submit a secondary claim as needed,

But

The case manager may submit a claim at any time.
 One may also submit a secondary claim as needed,

Or

- The case manager may submit a claim any time. The case manager may also submit a secondary claim as needed.
- 32. Use an appropriate level of detail

How much do you really have to tell the reader? It depends solely on the audience and the purpose of the policy or procedure. If you have varied experience levels, you need more detail. If everyone is a Ph.D. in chemistry, you may need less detail. Analyze your audience carefully.

33. Use an appropriate reading level

A good range for policies and procedures is sixth- to eighth- grade reading level. This is roughly the same range used by most newspapers, and your purpose is much the same as theirs: speed and clarity. Reading level is basically a matter of simplicity. The shorter the words and sentences, the lower the reading level and the faster users can read.

34. Analyze the audience

You have users and readers. You have experience and inexperience in both groups. Education, background, and expectation level may vary widely. Who your audience is, and what they're used to, helps you decide questions

such as reading level, level of detail, and jargon.

35. Remain impartial

This may sound odd, but what happens if you have to write a policy or procedure you strongly disagree with? Your writing tends to reflect your disagreement. The tone becomes harsh and judgmental, short and choppy, or perhaps long and flowery in an attempt to cover up the disagreement. It's perfectly OK to disagree. Work to change the policy or procedure if you want.

36. In procedures, use one action per step

Procedures require special clarity. A misunder-standing can turn deadly. Limiting each step to one action ensures that the reader gets the message clearly. Look for the action verbs, then list one per step.

37. In procedures, start with the verb

Procedure users want to know only two things: steps and sequence. Tell me what to do and in what order. Action verbs get to the heart of the matter and eliminate excess wording- no more searching. Use the more than one hundred common verbs in the verb bank in the appendices of this manual.

38. In procedures, assign the action

Don't assume that people know who's responsible at each step. Clarify by adding titles. Avoid pronouns. (Who is that ubiquitous "they," anyway?) If a single actor will complete the entire process, you only need to identify the responsible party once. But many policies and procedures require at least some interdepartmental activity. When responsibility shifts, make it clear.

It is not necessary to capitalize or otherwise emphasize position titles in the procedures section unless it has been requested. Be specific throughout the policy. Personal names must never be used in a policy.

39. In procedures, pack a sentence

This is a good technique for warnings and cautions. Put the punch where people will remember it most: at the beginning and end of the sentence. Example 2 is much stronger because the sentence was packed:

- During repairs, there is a danger of electric shock if the power is not turned off.
- ◆ Turn off the power during repairs, or you may receive an electric shock.
- 40. Within procedures, be consistent in formatting when making references to

Identify by number and title all DCS forms used in procedures. Italicize to show emphasis. Be consistent throughout the policy:

♦ CS-1234, Type Title Of Form After Form Number

forms, manuals, and other policies When making references to other manuals within procedures, underline the manual title for emphasis. Be consistent throughout the policy.

Manual for Developing Policies and Procedures

When making references to other policies within the procedures:

- ◆ DCS Policy 1.1, Policy Development and Review Process
- ◆ DOC Policy 305.03, Employee/Offender Relationships
- 41. In procedures, when there are several steps under one procedure...

When there are several steps under one procedure, use a numbered list to head each of these steps so that they are easily identifiable.

Where sub-steps are broken down into even smaller elements, use a lettered list or bulleted list to make them obvious.

Use regular text paragraphs to explain the items in the numbered or bulleted lists.

An example of a DCS policy procedure appears on page 23 of this manual.

10. Forms: Under this heading list all current forms that are used for carrying out the procedures of the policy. If there are no forms, indicate "none." (If you have any questions regarding forms or templates, contact the DCS forms development coordinator.)

Example:
Forms
CS-0130 Return to Home Placement

11. Collateral documents: This section lists additional procedure manuals or work aids that relate to the policy. For example the policy, "Incident Reports," is related to the incident-reporting manual, which explains procedures in detail.

Example:

Collateral Documents

Individual Program Plan Manual Permanency Plan Manual **12. Standards:** This section includes the corresponding standards of the American Correctional Association that administer the only national accreditation program for all components of adult and juvenile corrections or of other accrediting bodies for policy compliance.

Example:

Standards

ACA 3-JTS-1A-10 Indian Child Welfare Act of 1993 (25 USC 1901-1923)

13. Glossary: Key words within a policy statement or its procedures are defined in a short glossary at the end of the policy.

Definitions of key words in policies are also compiled into a self-contained glossary section to be included in the policy binder or in a separate binder. Policy authors and reviewers shall inform the DPC of any important terms that need to be defined in the policy and those that are not already defined in the glossary.

Design considerations: Tips on design for maintaining on-line policies and procedures - (Adapted <u>from Writing Effective Policies and Procedures</u> by Nancy J. Campbell)

1. Use small blocks of text

Scrolling through screen after screen of unbroken text makes it seem as if the policy or procedure is endless. The same is true for pieces of paper, but the effect is exaggerated on a screen. Keep sentences and paragraphs even shorter then normal. If possible use short, simple words.

2. Use lots of white space

In addition to small blocks of text, leave plenty of white space in margins. Separate graphics and text distinctly. Because the screen is harder on the eye than a piece of paper, you have to work harder so the reader can use it without.

3. If colors are used, limit colors to two (2)

If colors are used in the procedures, too many colors overwhelm the eye in the small space of a screen. Limit colors to two in both text and graphics.

4. Keep graphics simple

The contradiction here is that you can create wonderfully complex graphics on the computer, but you can't use them in your on-line system. They create visual clutter. Simplicity is the key to keeping the readers' attention.

5. Use hypertext

Hypertext is the ability to click on a highlighted word or phrase and instantly access related or supplementary material. It's a tremendous improvement over thumbing through hundreds of pages of a manual or even poring over an index or table of contents. (See example of hypertext in procedures example on page 23.)

6. If not using hypertext, give clear instructions on how to find related material

Hypertext is ideal, but if your system does not have the capability, tell your users exactly how and where to find related material. Can they type in a word or phrase and do a search? Do they have to scan the index or table of contents? Each system is different, so be sure instructions are clear.

CHAPTER 2

Format for Typing Policies

Format for Typing Policies

The DCS policy template form CS-0001, *Administrative Policies and Procedures*, is the official form for creating policies and must always be used when typing DCS policies and procedures. This form/template is not available electronically and must be obtained from the Departmental Policy Coordinator (DPC).

Tip: Portions of this template may also be "copied and pasted" into files for formatting local policies so that the typing is easy and consistent.

Filling in the template

The policy template must be filled in according to the following directions. Notice that the "cell" given for text expands as you type in text. You may type as much text as needed in any cell.

Index #: After the heading "Administrative Policies and Procedures:" the policy is assigned an official reference number and must be assigned only by the Departmental Policy Coordinator (DPC). The policy index number is also typed in the footer and header of the policy. The policy number is comprised of the corresponding policy chapter and a number, i.e., 13.1- "13" denotes the DCS Policy Chapter; "1" denotes the assigned number. Additional policy chapters (other than those listed on page 1 of this manual) may be established by the DPC as the need arises.

Subject: Type in the designated policy title, using upper and lower case letters, (capitalizing the first word and all important words—nouns, verbs, adjectives, or adverbs but not conjunctions, prepositions, or articles). Format the subject as a "Heading 2" style.

Example:

Subject: Responding to Reports of Child Abuse and/or Neglect

Header: Type in the title of the policy and its index number in the header of page 2. (There is no header for page 1.) If you select the preset type that appears where the information goes and just type over it, the header will be automatically formatted correctly.

Example:

Subject: Responding to Reports of Child Abuse and/or Neglect 14.1

Supersedes: When replacing existing policies or revising policies, list the superseded policy number and the effective date. If there are no existing policies that this policy supersedes, i.e., a new policy, type **none**.

Example: Supersedes: none, or DCS 1.1, 01/01/01."

Local Policy; Local Procedures; Training Required: Type "yes" if a facility or office needs a local policy or local procedures that expands the departmental policy for a particular region, facility or office, or "no" if a "local" policy is not needed. If training is required of employees to carry out the procedures, type "yes" or "no."

Approved by: When a policy is approved, the DPC links the electronically scanned signature of the Commissioner of Children's Services to this space. Until the Commissioner officially approves the policy by his original signature, this space remains blank.

Effective date: This is the date the policy will be implemented and not the date of the policy draft, review, or circulation. Use the date format of "**00/00/00**." Also this information will appear in the footer of the policy. Spell out the date in footer of the policy, i.e., **September 1, 2000**.

Revision date: This date is the date of a policy revision and becomes the most current effective date of the policy. The "Effective date" (listed above) remains the same for the life of the policy and only the "Revision date" will change each time the policy is revised. The revision date should also appear in the footer of the policy.

Please note: Revised policies will not be given a new revised date if there are minor revisions (no more than 3 sectional changes) within 3 months of the most recent effective/revision date, unless there are major revisions to the policy. Major revisions consist of 4 or more sectional changes or substantial changes throughout the policy and will require a policy rewrite and may be routed through the policy review process at the discretion of the policy owner/responsible staff.

Application: Type in the titles of all staff or persons to whom the policy applies, capitalizing the titles in this section only. Position titles listed in the application should be capitalized for *emphasis*. If possible, use "*Employees*" instead of "*Staff*."

Example:

Application

To All Assistant Commissioners, Superintendents, Program Directors And Program Operations Employees

Authority: Type in the legal authority by which the policy is issued. Always include the TCA code referencing the powers of the department, i.e., *TCA 37-5-106*. Questions or information for this section must be directed to the DCS legal counsel.

Example:

Authority: TCA 37-5-106, 31-1-406; TCA 37-5-112; TCA 37-1-606

Policy statement: Type in the policy statement here. Use the "normal style" paragraph.

Example:

Policy

Child Protective Services employees shall initiate child protective services investigations within the time frame assigned by the supervisor or his/her designee.

Procedures: Use the two-column format provided to type in the steps used to carry out a policy.

Major procedures (lettered)—Type major procedures (these are designated alphabetically, using capital letters in sequence) in the left column, using the "heading 3" style. Capitalize only the designating letter and the first word in the paragraph.

Numbered/List/Bulleted Substeps—Type the substeps (these are designated with arabic numerals) in the right column. Use either "list numbered" style, "normal" style, "list letter" style or "list bullet" style, as appropriate.

Note "list numbered" paragraphs are automatically numbered: do not type in a number before the paragraph. If "normal" or "list bullet" paragraphs fall between two numbered paragraphs, the automatic numbering may start again with 1. **To reset the automatic numbering** so that it is correct, put the cursor anywhere in the paragraph, choose *Format*, then *Bullets and Numbering*, choose the correct number in the Start At box; choose "Ok" to return to your typing. Examples of these formats appear in policy procedures on the following page:

Example:

Procedures

A. Screening and assignment

On the same day a report is received, the team leader or designee shall screen each report and decide whether or not to assign it for investigation. The team leader will take one of the following actions on each report based on criteria listed in DCS Policy 14.2, Child Protective Services Intake Decisions.

- 1. Gather more information
- 2. Assign for CPS investigation
- 3. Screen out the report

B. Reports requiring more information

- If the team leader decides to gather more information before making a screening decision, then he/she must document in the intake narrative the decision to gather more information, what is to be gathered, who is responsible for gathering the information, and in what time frame.
- 2. If sufficient information has not been obtained within 5 working days, the referral shall be screened out or assigned.

C. Reports screened out

- For all screened out reports, the team leader or designee will document why the report did not meet the criteria for investigation in the intake narrative box on the TN Kids screen and on form CS-0680, Child Protective Services Intake Form.
- Hard copies of screened out reports shall be retained for one year according to the procedure established by each Regional Administrator or designee. These are used for searching past history on new reports.
- 3. If a referral is not accepted for CPS (e.g., sexual abuse of a child over age 13 not in DCS custody) but involves other agencies with investigative and/or licensure responsibilities (e.g., law enforcement, DMH/DD licensed facilities, DHS daycare or DCS licensure), the appropriate agency shall be notified.

D. Reports assigned for investigation

- The team leader or designee shall assign accepted reports meeting the criteria for P-1 or P-2 response to a case manager the same day the report was received. Reports meeting criteria for P-3 response may be assigned to a case manager within the next working day after the report was received.
- 2. If a report appropriate for investigation is made on a

weekend, holiday, or after regular working hours, it may be assigned the morning of the next working day, unless the report meets the criteria for a P-1 or P-2 response, which will be assigned on the same day it was received.

E. Assigned response priority

- For each report assigned for investigation, the team leader or designee shall assign a response priority on the same day the report is received.
- The team leader or designee must assign to the report one
 of the following response priorities based upon the
 perceived harm or risk of harm to the child, possible
 preservation of the evidence, and coordination of the
 investigation with other investigative agencies (Child
 Protective Investigation Team) CPIT or individuals who
 license facilities).

a) Priority 1: Same day as assignment

Investigations based on reports given this priority must be initiated before midnight of the same day assigned to the case manager. Priority I reports may include but are not limited to CPS intake referrals that allege:

- Any presence of significant injury.
- Situations/incidents posing imminent danger due to a perpetrator continuing to have access to a child.
- Situations/incidents that are considered to pose intermediate to high risk of harm to the child.
- Likelihood that the family will flee.
- ◆ Abuse or neglect in school, childcare, residential facility, or other institutional settings unless the Child Protective Investigation Team (CPIT) or team leader determines that a delayed response is in the best interest of the children. For example, the child may be interviewed the next day at the Child Advocacy Center or the school, rather than at home under certain circumstances.

b) Priority 2: Next day after assignment

Investigations based on reports given this priority must be initiated before midnight of the next day after the report is assigned to the case manager. Reports that are assigned this priority would include any referrals that allege injuries or risk of injuries that are not life threatening or would not require immediate medical care. Priority 2 situations are those where a 24-hour delay will not compromise the investigative effort or reduce the chances for identifying the level of risk to the child.

c) Priority 3: Five (5) Working days after assignment

Investigations based on reports given this priority must be initiated within 5 calendar days after the report is assigned. CPS intake referrals that allege situations/incidents that are considered to pose low risk of harm to the child may be assigned this response priority. Priority 3 situations are those where the delay will not compromise the investigative effort or reduce the chances for identifying the level of risk to the child.

E. Response priority based on allegation

The team leader shall assign the appropriate response priority based on the allegations of harm or risk of harm, and based on the following information. The team leader may upgrade any of the listed priorities if he/she believes the level of risk requires a speedier response, or other unique circumstances require a more urgent response. If the team leader downgrades any priority, he/she must provide a written explanation in the intake narrative in the TN Kids system.

Forms: In the space provided, type in a list of forms used to carry out this policy. This list should all be "normal" paragraphs. (If you have questions regarding forms or templates, contact the DCS forms development coordinator.

Example:

Forms

CS-0680 Child Protective Services Intake

Collateral documents: Type in the names of related documents here. Note that this is "normal" style, plus the names of the documents should be in italics.

Example:

Collateral Documents

Case Manager's Manual

Standards: Type in a list of standards upon which the policy rests or with which the policy complies. (Example: *American Correctional Association; ACA Standard 1-234-56*)

Example:

Standards

ACA 3-JTS-1A-12

Glossary: Type in the terms to be defined in the left column and the definition in the right column. Use the "normal" style for both columns.

Page numbers: Numbering of each page is automatic.

Adding the state seal and authorizing signature

After policies have been approved, the DPC ensures that the electronic state seal and commissioner's signature are linked to these spaces so that every <u>official policy</u> is immediately identifiable by the seal and the signature.

Punctuation

- Use a comma to separate all items in a series of three or more items, including those items before and after the conjunction.
- Do not use a colon at the end of a heading line. The line break between the heading and the text accompanying it serves as punctuation enough.

Capitalization

- Normal and correct capitalization must be used.
- Position titles in the Procedures section such as "departmental policy coordinator" do not need to be capitalized but <u>may</u> be to show emphasis. Individuals' names should <u>never</u> appear in policy and procedure.

Chapter 3

Policy Development, Review, and Approval Process

Policy Development, Review, and Approval

Who may propose/write policies

Any DCS employee may propose a policy when there is a need to create one, or revise policies when policies need updating or changed. The appropriate director and/or assistant commissioner will approve all new created policies and policy revisions. If needed, the appropriate director/assistant commissioner appoints an author(s) or a policy writing team(s) to include the DPC, as needed, to write policy for the department.

The first draft must be forwarded to the DPC, who will circulate the policy to the appropriate policy reviewers. The policy reviewers is comprised of all assistant commissioners, central office directors, regional administrators, youth development center superintendents, group home supervisors, select field staff and/or contract providers and legal counsel and other employees and persons as deemed necessary.

Who assigns numbers to policies

Authors must not assign their own policy numbers. Only the DPC can assign policy numbers to draft policies. If this rule were ignored, the same policy numbers might be used to designate more than one policy although their subject matter differs.

Timeliness

In developing the policy, the author should be aware of the immediate needs and long-term goals of the department. Writers and reviewers must adhere to time limits: the entire process of drafting the policy, circulating it, and reviewing it, preparing it for electronic distribution should not exceed **30** working days.

-How proposed policies are reviewed

- 1. The DPC attaches form CS-0248, Review of Proposed Policy to the draft policy and forwards the draft by e-mail or other means to the designated policy reviewers indicating the date by which the review must be returned to the DPC. (The <u>draft</u> policy remains in the designated Policy Development folder (DPC "rights only") on the "F (Users) drive" until the policy is approved. All editing, etc. is done on the policy from the Policy Development folder.
- 2. The designated policy reviewers must return the review form with suggestions or comments to the DPC within 10 working days. Some reviews may be shorter or longer depending on the circumstances and nature of the policy. The reviewers may also send a copy of their comments to their respective central office directors.
- 3. Upon receipt of the reviewer's suggestions or comments, the DPC prepares a historical file for the policy that will contain all comments and suggestions and historical information pertinent to the particular policy. The historical policy information is kept on file indefinitely.
- **4.** After the review period, the comments and suggestions are accumulated and forwarded to the policy author for their review and to make a determination of which comments or suggestions should be incorporated into the policy.
- **5.** The DPC or policy author may contact the policy reviewers who have suggested changes that will <u>not</u> be incorporated and offer an explanation. This action may be verbal or written.
- **6.** If substantive changes have been made to the first draft relative to the comments or suggestions, it may be necessary to circulate a 2nd draft for review.
- **7.** If the policy cannot be finalized after a 2nd review, it may be necessary to assemble a work group comprised of staff relevant to the policy subject matter to reach a resolution to finalize the policy.
- 8. After the review comment/revision process is complete, the DPC will forward the draft policy to the legal division for review before the policy is released to the commissioner for his final approval. No policy will be forwarded to the Commissioner prior to review by the DCS Legal Counsel. (Also, some policies may initially require the review of the DCS legal counsel rather than later.)
- **9.** The DPC edits the policy and reviews the standards, forms, and glossary entries. The DPC also ensures that the historical file is in order and that a list of the policy reviewers is included in the file.
- **10.** The finalized policy is forwarded to the commissioner by the DPC for approval and after the policy is signed, the DPC notifies staff of the new, approved policy.

Chapter 4

Policy Updating and Notification

Policy Updating and Notification

Annual policy review

Although DCS policies are updated and revised as needed, all DCS policies must be reviewed annually. Each year the commissioner issues a memo to outline the annual policy review process. These memos must be maintained for a period of three years or for the American Correctional Association accreditation three-year cycle for the youth development centers and group homes.

Policy binders

Each DCS office or facility must maintain a current set of official policy binders and indexes. Policy binders *may* be monitored periodically.

If a policy cannot be obtained electronically, the designated staff person must notify the DPC, who will forward a copy of the policy to the office location.

Policy revisions/corrections

Employees responsible for maintaining the policy binders at designated locations should print out a current copy of the policy and policy index as new or revised policies are issued.

Employee awareness and training on new/revised policies

New or revised policies must be made available to staff as soon as possible. Employees may be informed of new policies or policy revisions through a procedure for work site circulation and sign-off or through staff meetings/training sessions. (See DCS Policies 1.1, Department of Children's Services Policy Development and Review Process; 1.3, Work Site Meetings.)

Verification of training on new/revised policies must be maintained at the work site and documented on forms CS-0479 and CS-0481, *Verification of Policy Understanding*, located in "DCS Forms" on the **DCS Intranet Web Site**.

Notification to employees

All new policies and procedures and updates are announced to all DCS staff via e-mail notification.

Printing

As new policies and updates are announced by the DPC, the policies can be printed directly from "Policies" on the DCS Internet Web Site. If information is needed regarding printing of approved policies, the DCS policy development coordinator should be contacted.

Chapter 5

Policy Revisions, Exceptions and Exemptions

Policy Revisions, Exceptions and Exemptions

Notification

To notify employees of policy revisions, the DPC will send an e-mail notice with a list attached informing employees of new policies, policy revisions and updates. The list serves as the official notice of new policies or revisions and will contain the policy number, title, policy chapter, effective date, forms, RDA information and other information regarding the policy.

Minor policy revisions should be limited to no more than three sectional changes. Substantive revisions (4 or more sectional changes) may require a policy rewrite. For example, if a policy is outdated or the procedural contents are revised extensively, the policy must be rewritten and may be routed through the normal policy review process.

Policy revision notices must not be used to rescind policy; rescission must be accomplished through a memorandum submitted to the commissioner.

Requesting a policy revision

To request a policy revision for a particular policy, the author must submit a draft of the revision to the departmental policy coordinator who will ensure that the request for revision is handled accordingly. If the policy revision requires a rewrite and review, it will be sent through the normal policy review process as outlined in Chapter 3.

After policy revision reviews are completed, the DPC will proceed as outlined in Chapter 3.

The list that is generated with the announcement of new policies and updates to employees will serve as the official documentation that the policy revision is in effect and approved by the commissioner. When notification of a policy revision is received, the employee(s) assigned to keep the policy binders updated may keep copies of the notification list for official notice of the policy revision. A copy of the list denoting revisions will be kept in the policy historical file.

Policy Exceptions and Exemptions

Some policies may have certain procedures outlined that are not pertinent to a particular DCS region, office, facility or program, therefore an exception or exemption to the policy or certain portions of the policy, may be requested by memo to the appropriate assistant commissioner. After the appropriate assistant commissioner and staff discuss and agree that an exception or exemption is warranted, the DPC should be notified and draft a memo requesting the exemption or exception of the policy for the Commissioner's signature and approval. A copy of the memo will be kept in the policy historical file.

Chapter 6

Local Policy Format

Local Policy Format

Typing

Local policies must be formatted on form CS-0251, *Local Administrative Policies and Procedures*. The template can be accessed from **the DCS Intranet Website**, "**DCS Forms**."

Local policy numbers

If a local policy is needed to expand a departmental policy or address a particular subject not covered by a departmental policy for a particular region, facility or office, the author must number the local policy with the *same number and title* as the corresponding departmental policy and then adding "0-1" after the decimal point. <u>For example</u>, a local policy written to correspond with DCS policy 11.1 must be numbered 11.0-1, etc. The *zero* as well as the policy title indicates that no departmental policy currently addresses that particular issue.

Annual review of local policies

The local administrator must document annual review of each local policy by date and signature. The administrator must then forward copies of local policies to the appropriate central office director, who specifies that division's process for approving local policies. Any further issues regarding content of local policies should be directed to the appropriate central office director.

Local policy binders

Facilities or offices with local policies must maintain them in a separate binder labeled, "Local Policies." The appropriate central office director must maintain a complete, current set of the local policies for the facilities or offices of his/her division. To ensure easy access by employees, the public information officer, auditors or others, local policies should be placed in a centralized location.

Chapter 7

Procedure Manuals

Procedure Manuals

Purpose

Procedure manuals are working tools that explain in detail the "who, how, when, and where" of certain tasks. They specify local idiosyncrasies in procedural activities that fall within required procedural mandates of the department's official policy.

Policy must be carefully examined to determine whether a procedure manual is feasible or necessary. Departmental policy not only communicates to staff the official goal and intent of the department, but, in procedure sections, also lists the mandatory activities and minimum standards required to carry out the policy. Procedure manuals **are not** to be created as a way to avoid drafting or revising official departmental policies and procedures.

Responsibilities of authors

The author(s) of a procedure manual must:

- Submit a new procedure manual designed to accompany a designated policy during the initial policy review process, so that its congruence with the policy for which it is written can be checked.
- Adequately distribute not only procedure manuals but also any revisions.
- Conduct an annual review of the procedure manual.
- Send copies of the revisions and/or revised cover sheet with new date to the DPC annually.

Inclusion in Policy Binders

A procedure manual may be placed inside the official policy binder following the departmental policy to which it applies or in a separate notebook. Procedure manuals should also listed as *collateral documents* in each policy to which they apply.

Appendices

- DCS Policy Template (with formatting styles marked)
- How to Use the Word Policy Template
- Sample of completed policy
- Guide to Subjects and Verbs
- List of Problem Words

State of Tennessee Department of Children's Services

Administrative Policies and Procedures: X.X

Subject: Name of the New Policy Goes Here

Supersedes: Local Policy:

Local Procedures: Training Required:

Approved by: (scanned signature goes Effective date: 00/00/00

here)

Application

To (type in the job titles of the persons to whom this policy applies)

Authority: Type in the legal authority references here.

Policy

Type in the policy statement here.

Procedures

A. Use heading3 style here

 Type the explanation of the step in here. You can type as many lines as you need. Select any glossary terms and format the font for them in dark green

a)

- Type a bulleted list by choosing the "list bullet" style. Insert a line break after the "substep" wording, then format the first line's font as italics
- Make sure the "List Number" paragraphs show the right automatic numbering—with the cursor in the list paragraph, choose *Format*, *Bullets* and *Numbering*, *Start At* and the number of the paragraph.
- **B.** 1.
- **C**. 1.

D. 1.

E. 1.

F. 1.

Forms/Templates

Type in a list of forms here.

Collateral Documents

Type in the names of documents/manuals, etc. here

Standards

Type in a list of standards (ACA) applicable to policy here.

Glossary

Term	Definition	
Type in term	Type in the definition here.	

How to Use the Word Template for Typing Policy

Before you begin

- 1. First, you must obtain the policy template from the DPC.
- 2. Now you are set to let the template shape every policy file you create.
- 3. You can tell what you're doing more easily if you do the following:
 - ♦ Choose Tools, Options, View, then click the check boxes next to Tabs, Paragraph marks, and Spaces so that you see these characters on the screen.
 - Much of this document is set up as cells of a table. You can tell more clearly what you're doing if you Choose Table, then Gridlines so that you see the edges of the cells in the tables
 - ♦ Choose View, then Page layout, so you can see what the page will look like when it is printed.

To create a new policy file

- 1. In Word, choose File, New. Then scroll down the list of templates and click on "policy," then on "OK."
- 2. Your new file should appear, with the categories (Subject, Application, Authority, Policy, etc.) already there. Just position your cursor where the information goes and begin typing.
- 3. To **replace** type, select it with the mouse and then begin typing. Your new type will be formatted the same as the old type. For example, the name of the policy will show up in blue.
- 4. To enter the correct information in the footer, choose View, Header and Footer. Then click the far left button on the toolbar that appears—this will take you from the header to the footer. When you have finished typing in the index number, the effective date and the total number of pages, choose Close. (Tip: search for X to find out places where you need to type in specific information such as the policy number and the number of pages.)

Formatting

- 1. In most cases, just clicking the cursor and typing will create text that is already formatted correctly. If you need to change the formatting for a whole paragraph (top make it a particular kind of heading, list paragraph, bulleted paragraph, or text paragraph), put the cursor somewhere within the paragraph, then choose the appropriate style.
- 2. Use preset styles from the template to format your text. Styles can be applied very easily by putting the cursor in the paragraph, then hitting the Alt key plus the code written in the margins of the Sample Template pages.
- 3. If you need to add/change formatting for some words but not the whole paragraph, select the text, then click on the formatting you want (bold, ital., font color).

4. Numbered paragraphs (List Numbered style): These paragraphs will number themselves automatically. HOWEVER, if there are Normal- or List Bullet-style paragraphs in between the numbered paragraphs, the numbering may begin again with 1. To change the paragraph's automatic number, choose Format, Bullets and Numbering, then put the correct number in the "begin at" slot on the left side of the dialog box.

Working with tables

- 1. To move from cell to cell in a table, just hit the Tab key. (With this document you probably will not need to actually set tabs within the table cells, but if you do, you can do so by holding down the control key while you hit the Tab.
- 2. To delete unused rows in a table, select the rows, then choose Table, Delete rows.
- 3. To add rows to a table
 - Put the cursor in the last cell of the table, then hit the Tab key; this will insert a new row at the end
 of the table
 - ◆ Put the cursor at the beginning of a row, then choose Table, Insert row. This will insert a new row before the cell in which you put the cursor.

Things NOT to do

- 1. Do not underscore any text—this will not translate well into the eventual on-line version of the policy manual.
- 2. Do not use the tab key or the spacebar to move characters over for alignment. (This is not a reliable method.) Instead, choose one of the paragraph formats supplied in the template or set a paragraph indent by choosing Format, Paragraph, then setting the indent OR by moving the paragraph margin markers on your screen's ruler bar.
- 3. Do not type a policy without using the policy template. You may cut and paste from a previous file into a new file that you have started with the policy template.
- 4. **Do not struggle along feeling lost**—contact the departmental policy coordinator for help.

SAMPLE POLICY

State of Tennessee Department of Children's Services

Administrative Policies and Procedures: 1.1

Subject: Policy Development and Review Process

Supersedes: DYD 1.2, 06/01/96 Local Policy: No

Local Procedures: No Requires Training: No

Approved by: "Commissioner's Signature" Effective date: 04/01/97

(entered electronically; the original signature remains on file in the Revision date:

policy historical files)

Application

To All Department of Children's Services Employees.

Authority: TCA 37-5-106, 37-5-112

Policy

All Department of Children's Services policies shall be formulated by employees and reviewed by all Assistant Commissioners, General Counsel/designee, Directors and other employees as appropriate. Policies shall be considered final upon the signature of the Commissioner and shall be disseminated to all employees. All policies shall be reviewed annually, updated and processed as outlined in the Policy Development Procedure Manual.

Procedures

A. Responsibilities of the policy development coordinator

- 1. The policy development coordinator shall:
 - a) Create policy documents
 - b) Coordinate the policy review, circulation, and revision process
 - c) Track policies in the development process
 - d) Ensure that all employees have access to policies and procedures and are aware of new policies and updates

- e) Maintain files on all draft policies
- f) Maintain historical files on each policy
- g) Develop and update the Policy Development Procedure Manual annually
- The Policy Development Procedure Manual must outline all areas of the policy development, review and the approval process. It must also specify the requirements for manuals, policy revisions, local policies, appropriate forms, and the time frames for review.

B. Policy access

All DCS office locations must provide access to DCS policies and procedures by providing policy and procedure manuals and/or the technology for DCS policies and procedures to be accessed by computer.

C. Divisional responsibilities

- Each division is responsible for the communication, training, annual review, and interpretation of policies and procedures for their employees.
- 2. Form CS-0479, *Verification of Policy Understanding* (Multiple Employees), or CS-0481, *Verification of Policy Understanding (Individual)* must be completed by the supervisor/trainer providing the policy training.

Forms/Templates

CS-0481 Verification of Policy Understanding (Individual)

CS-0479 Verification of Policy Understanding (Multiple Employees)

Collateral Documents

Policy Development Procedure Manual

ACA Standards

3-JCRF-1A-03

3-JCRF-1A-12

3-JCRF-1A-13

3-JTS-1A-17

3-JTS-1A-18

3-JTS-1A-19

Glossary

Term	Definition	
Policy	A course of action adopted by and pursued by an agency that guides and determines present and future decisions and actions. Policies indicate the general course or direction of an organization within which the activities of the personnel must operate. (<i>The American Correctional Association</i>)	
Procedure	The detailed and sequential actions that must be executed to ensure that a policy is implemented. It is the method of performing an operation or a manner of proceeding on a course of action. It differs from a policy in that it directs action required to perform a specific task within the guidelines of the policy. (<i>The American Correctional Association</i>)	

Guide to Subjects and Verbs

The following verb choices will be used in order to state clearly and consistently in DCS policies what the level of responsibility and accountability is for a particular procedure. Please use the following guidelines.

<u>To indicate</u> <u>a</u>	<u>Requirement</u>	Recommendation	<u>Choice</u>	Sequence of events
	The staff member is held accountable for performing these tasks.	Indicates best practice, but the staff member is not held accountable.	The staff member may choose among options	This procedure is to be expected but DCS policy does not compel it
<u>Use</u>	Shall/Must/Will	<u>Should</u>	<u>May</u>	<u>Does</u> (or the simple present tense of the verb)
Examples	All Department of Children's Services policies Shall/Will be formulated by DCS employees			
	Managers <u>Must</u> ensure that line staff participate in the decision making process.	A written notice and agenda Should be sent to the participants prior to the meeting.	Administrators May choose to have a succession roster.	The commissioner Schedules a meeting with senior manager at least annually.
	The home county case manager Must mail a copy of the signed order to the residential case manager and the youth must be returned home on the appropriate date.		A letter <u>May</u> be substituted for a faceto face or telephone contact, but only once per quarter.	The court <u>Holds</u> a hearing on such a motion within 3 days of an emergency removal.

Subjects of sentences/active voice constructions

To state clearly and explicitly <u>WHO</u> is responsible for a task or procedure, use active voice, which requires that the subject of the sentence be the doer of the verb.

Active voice sentences USE THESE	Passive voice sentences DON'T USE THESE
The assistant commissioner must forward a copy of each written description and organizational chart to the director of planning.	A copy of each written description and chart must be forwarded by the assistant commissioner to the director of planning.
The director of planning must make copies available to all departmental units.	Copies must be made available to all departmental units. (by WHOM ? It's unclear)

List of Problem Words

(Adapted from Writing Effective Policies and Procedures by Nancy J. Campbell)

Here are some word pairs with similar spellings but with different meanings that are commonly abused, misused, and confused.

accept to admit or agree; to regard as normal or usual, true, or right; to take in

stride [a verb]

except to exclude; an exception to [a preposition]

affect to influence, to pretend [a verb]

effect a result [a noun], to accomplish or bring about [a verb]

all ready all is ready; in a state of readiness

already existing, completed

all right [correct form]
alright [incorrect form]

advise to offer suggestionsinform to provide information

between for two things [as a general rule], for three or more items if each item is

considered individually

among for more than two things [as a general rule]

biweekly once every two weeks

semiweekly twice each week

can is able to, is capable of

may has permission to

compliment to praise; to say something favorable, kind, or flattering

complement something making up a whole; work in accord with; suit well

continual repeated frequently, lasts but with breaks or pauses

continuous without interruption

discreetprudent, knowing when to be silentdiscreteseparate, disunited, discontinued

further more, additional

farther distance

fewer a number

less a quantity or volume

imply to suggest or hint [done by the speaker]

infer to surmise or conclude [done by the listener]

insure to protect [used with finances]

ensure to guarantee

assure to pledge or make safe [used with people]

lie to recline in a prone position [used with people]

lay to put or place [used with objects]

likesimilar to [a literal comparison]asin the same degree or amount

precedents [plural of precedent, meaning a standard or norm, or a significant event that

is a turning point]

precedence precedes or comes first; takes priority over; comes before

principle a fundamental law, doctrine, or assumption [a noun]

principal most important or influential [an adjective]

regardless in spite of, without concern

irregardless [no such beast- please don't use it!]

stationarysolid, unmovingstationerya piece of paper

that [preposition used with a dependent clause that contains essential

information- hint, no commas]

which [prepositions used with an independent clause that contains nonessential

information- hint, commas]

will to promise, to require to

Shall to make an absolute promise [a stronger form of will]